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10 Attorneys for Defendants
11 SPORTS MEDIA SERVICES, LLC
(ERRONEOUSLY NAMED AND
SERVED AS FOX CORPORATION),
12 FOX SPORTS HOLDINGS, LLC,
FOX SPORTS 1, LLC, FOX SPORTS
13 2, LLC, and FOX SPORTS
PRODUCTIONS, LLC

14 UNITED STATES DISTRICT COURT

15 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

17 NOUSHIN FARAJI, individually, and
18 on behalf of others similarly situated,

19 Plaintiff,

20 v.

21 FOX CORPORATION, a Delaware
corporation, FOX SPORTS
22 HOLDINGS, LLC, a Delaware limited
liability company, FOX SPORTS 1,
23 LLC, a Delaware limited liability
company, FOX SPORTS 2, LLC, a
Delaware limited liability company,
24 FOX SPORTS PRODUCTIONS, LLC,
a Delaware limited liability company,
CHARLIE DIXON, an individual,
25 SKIP BAYLESS, an individual, JOY
TAYLOR, an individual, and DOES 1-
26 25, inclusive,

27
28 Defendants.

Case No.
LASC Case No. 25STCV00101

**DECLARATION OF MICHAELA R.
GOLDSTEIN IN SUPPORT OF
DEFENDANT SPORTS MEDIA
SERVICES, LLC'S
(ERRONEOUSLY NAMED AND
SERVED AS FOX CORPORATION)
NOTICE OF REMOVAL**

[Filed Concurrently with: Notice of Removal of Action; Corporate Disclosure Statement; Notice of Interested Parties; and Declaration of Joy Dumla in support of Defendant's Notice of Removal of Action]

Complaint Filed: January 3, 2025
Trial Date: None Set

1 **DECLARATION OF MICHAELA R. GOLDSTEIN**

2 I, Michaela R. Goldstein, declare as follows:

3 1. I am an attorney duly admitted to practice before this Court. I am an
4 associate with Sheppard, Mullin, Richter & Hampton LLP, attorneys of record for
5 Defendant Sports Media Services, LLC (erroneously named and served as Fox
6 Corporation) (“Sports Media”) in the above-referenced action. I am one of the
7 attorneys primarily responsible for managing the defense of this action on behalf of
8 Sports Media, and I am personally familiar with the pleadings filed in this action
9 and my firm’s files for this matter. If called as a witness, I could and would
10 competently testify to all facts within my personal knowledge except where stated
11 upon information and belief.

12 2. A true and correct copy of the proposed class action summons and
13 complaint (“Complaint”) filed on behalf of Plaintiff Noushin Faraji against Sports
14 Media in the Superior Court of the State of California, County of Los Angeles,
15 which initiated Case No. 25STCV00101 (“State Court Action”) is attached hereto
16 and marked “**Exhibit C.**”

17 3. On January 7, 2025, Sports Media (erroneously named and served as
18 Fox Corporation) was served with Plaintiff’s Complaint by personal service. A true
19 and correct copy of the Proof of Service for Sports Media is attached hereto and
20 marked “**Exhibit D.**”

21 4. A true and correct copy of Sports Media’s Answer to Plaintiff’s
22 Complaint which Sports Media filed in the State Court Action on February 4, 2025
23 is attached hereto and marked “**Exhibit E.**”

24 5. On January 29, 2025, Sports Media was served with an Initial Status
25 Conference Order and Minute Order in the State Court Action. A true and correct
26 copy of these Orders is attached hereto and marked “**Exhibit F.**”

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1 6. A true and correct copy of Skip Bayless's Answer to Plaintiff's
2 Complaint, which Mr. Bayless filed in the State Court Action on February 5, 2025 is
3 attached hereto and marked "**Exhibit G.**"

4 I have read the foregoing declaration and I declare under penalty of perjury
5 under the laws of the United States and the State of California that the foregoing is
6 true and correct.

7 Executed on this 5th day of February 2025 in Los Angeles, California.

/s/ Michaela Goldstein

MICHAELA GOLDSTEIN